

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

| | |
|----------------------------------|-------------------------|
| LG. PHILIPS LCD CO., LTD., |) |
| |) |
| Plaintiff, |) C.A. No. 05-292 (JJF) |
| |) |
| v. |) |
| |) |
| TATUNG COMPANY; |) |
| TATUNG COMPANY OF AMERICA, INC.; |) |
| CHUNGHWA PICTURE TUBES, LTD.; |) |
| AND VIEWSONIC CORPORATION, |) |
| |) |
| Defendants. |) |

**DEFENDANTS' MOTION FOR PARTIAL SUMMARY
JUDGMENT ON INVALIDITY OF CLAIMS 3-6, 14-17, 21-24
AND 32-35 DUE TO INDEFINITENESS**

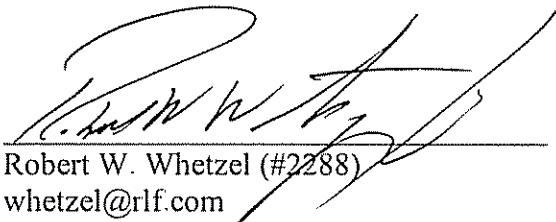
Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendants Chunghwa Picture Tubes, Ltd., Tatung Company, Tatung Company of America, Inc. and Viewsonic Corporation (“Defendants”) respectfully move for summary judgment that Claims 3-6, 14-17, 21-24 and 32-35 of Plaintiff LG. Philips LCD Co., Ltd.’s (LPL) U.S. Patent No. 5,019,002 (the “002 patent”) are invalid because the term “pickup pad” is neither defined nor described in the specification. The grounds for this motion are fully set forth in Defendants’ Memorandum of Law in Support of Its Motion For Partial Summary Judgment on Invalidity of Claims 3-6, 14-17, 21-24 and 32-35 Due to Indefiniteness filed contemporaneously herewith.

Defendants respectfully request the Court’s consideration of this motion outside of the time frame set forth in the scheduling order, since it depends upon the Court’s June 13, 2006 Markman ruling and recently completed discovery, as set forth in the accompanying memorandum of law.

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Viewsonic Corporation

Dated: July 6, 2006

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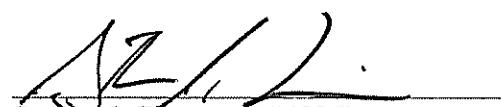
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 6, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing, and hand delivered to the following:

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I hereby certify that on July 6, 2006, I sent the foregoing document by Electronic Mail, to the following non-registered participants:

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